

Eric A. Prager (EP-0964)
Robert L. Jacobson (*pro hac vice*)
DARBY & DARBY P.C.
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: 212.527.7700
Facsimile: 212.527.7701
Email: eprager@darbylaw.com
Email: rjacobson@darbylaw.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
THE ASSOCIATED PRESS,	:	
	:	
<i>Plaintiff,</i>	:	No. 1:08-CV-000323 (PKC)
	:	ECF CASE
v.	:	
	:	
ALL HEADLINE NEWS CORP., ET AL.,	:	
	:	
<i>Defendants.</i>	:	
-----X		

**DEFENDANTS' RENEWED MOTION AND
NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE THAT Defendants All Headline News Corp., AHN Media Corp., W. Jeffrey Brown and Danielle George hereby respectfully move this Court before the Honorable P. Kevin Castel, on a date and time as soon as counsel may be heard, for an order dismissing Counts I, III, IV, V, VI and VII against all defendants pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) and for the reasons stated in the accompanying Memorandum of Law.

Respectfully submitted,

By: s/ Eric A. Prager
Eric A. Prager (EP-0964)
Robert L. Jacobson (*pro hac vice*)
DARBY & DARBY P.C.
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: 212.527.7700
Facsimile: 212.527.7701
E-mail: eprager@darbylaw.com
E-mail: rjacobson@darbylaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Defendants' Renewed Motion and Notice of Motion to Dismiss was submitted to the Court's CM/ECF system on May 12, 2008 for service through the Court's Electronic Transmission Facilities upon the following:

Andrew Lawrence Deutsch
Christine M. Jaskiewicz
DLA Piper US LLP (NY)
1251 Avenue of the Americas
New York, NY 10020

Counsel for Plaintiff

s/ Eric A. Prager

By: Eric A. Prager